

1 The Honorable Thomas S. Zilly
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 SETH VILLAFAN, a single man; WOLFGANG
10 OLSON, a single man; and JOSH GRAVES, a
11 married but separated man,

Plaintiffs,

12 V.

13 NORTHWEST MOTORSPORT, LLC, a
14 Washington limited liability company; HILT
15 VENTURE CAP INC., a Washington limited
liability company; DONALD FLEMING and
16 JANE DOE FLEMING, residents of Montana,
and the marital community composed
thereof; NORTHWEST MOTORSPORT, INC.,
17 a Washington corporation; RICHARD FORD
and JANE DOE FORD, residents of Texas,
and the marital community composed
thereof; RFJ AUTO PARTNERS NORTHERN
18 HOLDINGS, INC., a Delaware corporation;
JOHN and JANE DOES 1-5 and the marital
20 communities composed thereof; and RFJ
AUTO GROUP, INC., a foreign corporation,
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22 Defendants.

23 NO. 2:20-cv-01616 TSZ

**STIPULATED MOTION AND ORDER
FOR EXTENSION OF DEADLINE
FOR FILING MOTIONS RELATED
TO CLASS CERTIFICATION**

CLERK'S ACTION REQUIRED

**NOTE ON MOTION CALENDAR:
WEDNESDAY, NOVEMBER 15, 2022**

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**STIPULATED MOTION AND ORDER FOR
EXTENSION OF DEADLINE FOR FILING MOTIONS
RELATED TO CLASS CERTIFICATION - 1**
No. 2:20-cv-01616 TSZ

Law Offices of Eugene N. Bolin, Jr., P.S.
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I. STIPULATED REQUESTED RELIEF

Pursuant to LCR 7(j) and LCR 10(g), the parties to this action, hereby stipulate and jointly request relief regarding the deadline for filing motions related to class certification.

| Event | Current Deadline | Proposed Deadline |
|--|-------------------------|--------------------------|
| Deadline for filing motions related to class certification | November 17, 2022 | December 1, 2022 |

The parties agree that the current deadline for filing a motion for class certification should be extended to December 1, 2022. Good cause exists for this extension of time given the scheduling conflicts of experts whose participation in the preparation of the motion is essential. One such expert also continues to recover from Covid. The parties agree that the current deadline for filing motions related to class certification should be extended to Thursday, December 1, 2022.

Based on the foregoing, counsel for the parties has conferred and agreed that an extension of the deadline for filing motions related to class certification is warranted. The parties hereby stipulate to the proposed extension.

IT IS SO STIPULATED, and a proposed order consistent with LCR 10(g) is attached herewith. The parties respectfully request entry of the subjoined order.

IT IS SO STIPULATED. THROUGH COUNSEL OF RECORD.

**STIPULATED MOTION AND ORDER FOR
EXTENSION OF DEADLINE FOR FILING MOTIONS
RELATED TO CLASS CERTIFICATION - 2**

Law Offices of Eugene N. Bolin, Jr., P.S.
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Phone: 425-582-8165
eugenebolin@gmail.com

1 DATED this 15th day of November, 2022.

2 Law Offices of Eugene N. Bolin, Jr., PS
3 By: s/Eugene N. Bolin, Jr.
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10 *Attorney for Plaintiffs*

11 DATED this 15th day of November, 2022.

12 Forsberg & Umlauf, P.S.
13 By: s/Paul S. Smith
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23
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25
26 **STIPULATED MOTION AND ORDER FOR
27 EXTENSION OF DEADLINE FOR FILING MOTIONS
28 RELATED TO CLASS CERTIFICATION - 3
29 No. 2:20-cv-01616 TSZ**

30 **Law Offices of Eugene N. Bolin, Jr., P.S.
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33 Phone: 425-582-8165
34 eugenebolin@gmail.com**

ORDER

This matter, having come before the Court on the above-stipulated motion, IT IS

SO ORDERED THAT:

1. Relief is granted to extend the following deadline:

| Event | Current Deadline | New Deadline |
|--|-------------------------|---------------------|
| Deadline for filing motions related to class certification | November 17, 2022 | December 1, 2022 |

Dated this 17th day of November, 2022.

Thomas S. Zilly

THE HONORABLE THOMAS S. ZILLY

**STIPULATED MOTION AND ORDER FOR
EXTENSION OF DEADLINE FOR FILING MOTIONS
RELATED TO CLASS CERTIFICATION - 4**

No. 2:20-cv-01616 TSZ

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DECLARATION OF SERVICE

I hereby certify that on the 15th day of November, 2022, I caused the foregoing document to be filed with the Clerk of the Court via the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following persons:

Martin J. Pujolar, WSBA #36049

Paul S. Smith, WSBA #28099

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Attorneys for Defendants Northwest
Motorsport, LLC, Northwest Motorsport,
Inc., Donald Fleming, Richard Ford, RFJ
Auto Partners Northern Holdings, Inc., RFJ
Auto Group, Inc.

I affirm under the laws of the State of Washington and the United States that the foregoing is true and correct to the best of my knowledge.

DATED this 15th day of November, 2022, at Edmonds, WA.

LAW OFFICES OF EUGENE N. BOLIN, JR., P.S.

s/Eugene N. Bolin, Jr.

Eugene N. Bolin, Jr., WSBA #11450

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**STIPULATED MOTION AND ORDER FOR
EXTENSION OF DEADLINE FOR FILING MOTIONS
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